

## **REMARKS**

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-20 were pending in this application. Claims 1, 11, 16 and 20 have been amended hereby to more clearly recite the features of the present invention. Accordingly, claims 1-20 will remain pending herein upon entry of this Amendment. Support for the Amendment to the independent claims can be found, for example, in Figure 1 and the paragraph beginning at page 4, line 15 of the present application. For the reasons stated below, Applicants respectfully submit that all claims pending in this application are in condition for allowance.

In the Office Action, claims 13 and 16 were rejected under 35 U.S.C. §112, second paragraph as being indefinite, and claims 1-20 were rejected under 35 U.S.C. §103(a) as being unpatentable under Golden et al. To the extent these grounds of rejection might still be applied to claims presently pending in this application, they are respectfully traversed.

### **§ 112, SECOND PARAGRAPH REJECTIONS**

With respect to the rejection of claim 13, it was noted in the Office Action that it was unclear what limitation was being claimed in regard to "demand print data." As set forth clearly on page 8, lines 4-22 of the present application, there are two types of data typically employed to generate a bill by a telecommunications service provider, such as a telephone company. Specifically, there are (i) usage or toll type charges and services and (ii) other charges, other than toll/usage charges. As defined in the present application, pre-bill data refers to the toll/usage data, which typically varies during a single billing cycle, and demand print data refers to the

second type of charges other than toll/usage charges, which typically include standard line charges, local number portability charges, inside wire service and trouble determination plans, call waiting and emergency 911 charges, and the like. In view of the clear definition of both "pre-bill data" and "demand print data" in the present application, Applicants respectfully submit that those of ordinary skill in the art would fully appreciate the meaning of these terms as recited in claim 13.

With respect to claim 16, Applicants have amended this claim to address the antecedent basis issue raised in the Office Action.

In view of the above, Applicants respectfully request that the § 112, second paragraph, rejection of claims 13 and 16 be reconsidered and withdrawn.

#### **§ 103 REJECTION**

The present invention facilitates the review of bills that are to be sent to customers of a business entity. More specifically, the present invention is particularly applicable to a telecommunications provider that sends out tens or even hundreds of thousands of bills on a periodic basis to customers. These bills, as required by law, include taxes that must be paid by the customers. Because of the sometimes complex nature of the tax structures and calculations, it is not uncommon for errors to appear on customer bills. Such errors can have significant ramifications including legal action taken against the telecommunications services provider. Accordingly, it is imperative that bills that are sent to customers are as accurate as possible, especially with respect to the taxes that are calculated and charged.

In view of the foregoing, the present invention provides a system and method by which bills that are to be sent to customers are first reviewed for tax charges before the bills are sent to

the customers. These bills, so-called "hold bills," are held by a main frame computer before being released to customers. In accordance with the present invention, these hold bills are used in a comparative analysis to determine whether the taxes appearing thereon are consistent with independently-calculated taxes based on the same data on which the hold bills were generated.

This aspect of the present invention is more clearly defined in the amended claims. Specifically, as now recited in amended claim 1, the method according to the present invention comprises a method including downloading, from a mainframe computer, to a local server billing data associated with a customer account, the billing data being associated with a hold bill that is scheduled to be sent as a customer bill to a customer, the hold bill including calculated tax charges. Independent claims 11 and 20 have been similarly amended.

Golden et al. describe an automated taxable transaction reporting/collecting system in which individual point of sale terminals disposed at vendor locations are connected via a network to automatically store and report taxes that result from sales at the point of sale terminals. The transactions and calculated taxes due are collected at a central location and passed on to a taxing authority, such as the federal government. Golden et al. is concerned with reducing fraud that exists in connection with reporting sales and associated taxes.

However, Golden et al. is completely silent with respect to comparing taxes on a bill that is to be sent to a customer, i.e., a hold bill, to independently-calculated taxes to determine whether the taxes on the hold bill are correct. Indeed, the present invention is directed to a billing verification system whereas Golden et al. is directed to a tax reporting system. As such,

Golden et al. is completely different from the invention as recited by independent claims 1, 11 and 20, as well as the claims dependent thereon.

Because Golden et al. fail to disclose or even to remotely suggest each and every limitation of the invention as recited by the pending claims herein, Applicants respectfully request that the §103(a) rejection based on Golden et al. be reconsidered and withdrawn.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

SHAW PITTMAN LLP  
1650 Tysons Boulevard  
McLean, VA 22102  
Tel: 703/770-7900

Date: April 22, 2003

Respectfully submitted,

DALE JOHNSON ET AL.

By:

  
Lawrence D. Eisen  
Registration No. 41,009

Attachments: Amended Claims w/ Markings

LDE/dkp

**VERSION WITH MARKINGS TO SHOW CHANGES MADE TO CLAIMS**

1. (Amended) A method of verifying charges on a customer bill, comprising the steps of:

downloading, from a mainframe computer, to a local server billing data associated with a customer account, the billing data being associated with a hold bill that is scheduled to be sent as a customer bill to a customer, the hold bill including calculated tax charges;

populating a database with a portion of the billing data;

performing pre-calculation functions on another portion of the billing data and populating the database with results of the pre-calculation functions;

displaying predetermined categories of information stored in the database;

calculating the taxes for each of several charges in the billing data and storing tax results in the database; and

comparing the tax results with the calculated tax [information] charges on the customer hold bill.

11. (Amended) A method of verifying taxes on account charges on a customer hold bill, the hold bill being a bill that is scheduled to be sent as a customer bill to a customer, the method comprising the steps of:

maintaining a tax rate information database that is in communication with a data network;  
maintaining a database that includes account charges;

automatically applying the tax rate information to the account charges and storing a result;

displaying the result on a computer that is in communication with the data network; and comparing the result with the taxes appearing on the hold bill.

16. (Amended) The method of claim 15, further comprising applying optical character recognition software to the image and storing a file representative of [the] characters obtained.

20. (Amended) A method of independently verifying the accuracy of tax charges on a bill generated for a customer account, the bill being one that is scheduled to be sent as a customer bill to a customer, the method comprising the steps of:

downloading data, including customer charges, that is the basis for bill generation, to a local server;

automatically determining which charges are subject to taxation;

automatically calculating the tax for the charges subject to taxation and storing tax results;

displaying the tax results; and

comparing the tax results to the tax charges on the bill,

wherein the bill generated for a customer account is generated on a mainframe computer and the local server is operable separately from the mainframe computer.